

Honorable Timothy W. Dore
Hearing date: August 11, 2017; 9:30 a.m.
Hearing Place: Room 8106, 700 Stewart Street, Seattle, WA 98101
Responses due by: August 4, 2017; by 4:30 p.m.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:) Chapter 7
COMR.SE CORP.,) Bankruptcy No. 17-11571
Debtor(s).) TRUSTEE'S MOTION FOR AN ORDER
AUTHORIZING SALE OF PERSONAL
PROPERTY OF THE ESTATE

COMES NOW the trustee, Nancy James, through counsel, The Livesey Law Firm, and Rory C. Livesey, and moves this court for an order authorizing the trustee to sell the personal property of the debtor to Kyle M. Schei for \$8,450. The sale is "as-is, where-is" with no warranties or representations. The sale will not be free and clear of liens and interests, although the trustee is not aware of any encumbrances against the assets she is proposing to sell.

The debtor lists several assets on its schedules. Most are shown to have an unknown value. However, among the assets is a patent that has lapsed for nonpayment of fees to maintain and a license agreement of the debtor's software to a third party. The licensee is to pay two percent of its net revenue to the debtor for the licensing fee. To date, it has not produced net revenue. The remaining assets consist of a customer list and software.

The assets are difficult to value. However, parties interested in purchasing those assets have also been difficult to come by. The debtor ceased operations more than one year prior to filing the bankruptcy petition. It has no going concern value.

Kyle M. Schei was the cofounder of the company who left shortly after it started operations. Nevertheless, the trustee believes that he is a good faith purchaser for value.

1 WHEREFORE, the trustee prays for an order authorizing the trustee to sell the debtor's
2 personal property to Kyle Schei for \$8,450.

3 DATED this 13th day of July, 2017.

4 THE LIVESEY LAW FIRM

5 */S/ Rory C. Livesey*

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7 Rory C. Livesey, WSBA #17601
8 Attorneys for Trustee